

McCarthy Consulting LLC

Helping Your Business Benefit from the Section 232 Steel and Aluminum Derivative Process

Summary: The Trump Administration has created a process for companies that make products from steel and aluminum to request 50% tariffs be applied to foreign competitors' imports of steel and aluminum derivative products to the United States. Requests are made during two-week periods three times a year in January, May, and September. The process is administered by the Department of Commerce's Bureau of Industry and Standards. Following the two-week request window, the requests are posted online and then there is a two-week public comment period for stakeholders to offer their views (i.e., support/opposition) regarding the requests. The Department of Commerce makes decisions on the requests within 60 days of the public comment period opening.

Next Application Period: The next two-week application period will begin January 1st.

Previous Application Periods: The first submission window occurred in May 2025 with results announced in August. Over 400 products were added to the list of products subject to 50% tariffs. The products covered a wide range of derivative goods including railcars, equipment and machinery—such as tractors, bulldozers, forklifts, and cranes—trailers, wind turbines, metal furniture components, and products shipped in steel/aluminum containers such as condensed milk and paint. The second submission window closed in September, and the Commerce Department is expected to announce decisions in November.

Criteria: The Commerce Department established criteria it would use to evaluate requests. The criteria include data on imports, the effect of imports on the domestic industry, and how imports impact national security and the goals of the underlying Section 232 steel and aluminum tariffs. In addition to providing this info, requesters must also include the relevant HTSUS code.

Who Can Participate: 1) Any domestic company making steel or aluminum derivative products or association representing such companies can submit a request for tariffs. 2) Any stakeholder can submit a comment in support of or in opposition to a request for tariffs during the two-week public comment period.

McCarthy Consulting LLC has the expertise to provide the research, technical knowledge, and political experience to **draft a successful request for your company. Reach out to learn more about the process and how we can help your business succeed:**

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